

## **REMARKS**

Reconsideration of the above-referenced application in view of the above amendment, and of the following remarks, is respectfully requested.

Claims 1-2, 4, 6-22 and 24 are pending in this case. Claims 1, 4, 6, 7, 20 and 24 are amended herein and claims 3, 5, and 23 are cancelled herein.

The Examiner rejected claims 1-3, 6-10 and 20-22 under 35 U.S.C. 102(b) as being anticipated by Metz et al. (U.S. Patent 5,400,202).

Applicant respectfully submits that amended claim 1 is unanticipated by Metz as there is no disclosure or suggestion in Metz of an SCR with the first region, the second region, the third region, and the fourth region, each having a third width, the third width being greater than the first width of the fifth region. Metz does not teach a width of the fifth region (the region at the interface of the well and base regions) being smaller than the width of the other SCR regions. Accordingly, Applicant respectfully submits that claim 1 and the claims dependent thereon are unanticipated by Metz.

Applicant respectfully submits that amended claim 20 is unanticipated by Metz as there is no disclosure or suggestion in Metz of a third nmoat formed at an interface between the n-well region and p-type substrate, the third nmoat having a first width and an external pumping circuit comprising an nMOSFET with a source and drain each having a second width, wherein the ratio of the second width to the first width is at least about three to one. Metz does not teach a width of the third nmoat region (the region at the interface of the well and base regions) being smaller than the width of the source and drain region of the trigger FET. Although Metz teaches an external trigger FET may be used, in the embodiment shown, the third nmoat of the SCR is the drain region of the trigger FET. There is no teaching of suggestion for the ratio of the second width (of the trigger FET drain region) to the first width (of the interface nmoat) being at least about

three to one. Accordingly, Applicant respectfully submits that claim 20 and the claims dependent thereon are unanticipated by Metz.

The Examiner rejected claims 4, 5, 11-19, 23 and 24 under 35 U.S.C. § 103(a) as being unpatentable over Metz et al. (U.S. Patent 5,400,202) in view of Russ et al. (U.S. Patent 6,909,149 B2).

Applicant respectfully submits that claim 4 is patentable over Metz in view of Russ as there is no disclosure or suggestion in Metz of an SCR with the first region, the second region, the third region, and the fourth region, each having a third width, the third width being greater than the first width of the fifth region, as required by claim 1 from which claim 4 depends. Metz does not teach a width of the fifth region (the region at the interface of the well and base regions) being smaller than the width of the other SCR regions. Russ, likewise, does not teach a width of a fifth region of an SCR being smaller than a width of the first, second, third, and fourth regions of the SCR. In Russ, FIG. 4A, the widths of the anode and cathode of the SCR, are the same. There is no disclosure or suggestion in the references of an interface region of the SCR having a smaller width than the first, second, third, and fourth regions of the SCR. Accordingly, Applicant respectfully submits that claim 4 is patentable over the references.

Applicant respectfully submits that claim 4 is further patentable over the references as there is no disclosure or suggestion of the transistor regions having a width greater than the fifth region of the SCR. The gate regions G1 and G2 of Russ have the same width as the anode and cathode of the SCR. They do not have a greater width than any region of the SCR. Accordingly, Applicant respectfully submits that claim 4 is further patentable over the references.

Applicant respectfully submits that claim 11 is patentable over the references as there is no disclosure or suggestion in Metz in view of Russ of the sixth region and the seventh region of the transistor having a second width substantially greater than the first width of the first, second, third, and fourth regions of the SCR. Metz does not teach a

relative width for the trigger FET except that the drain may be the interface region of the SCR. Russ teaches "larger" gate regions G1 and G2 as being the same width as the anode and cathode. There is no disclosure or suggestion of sixth region and the seventh region of the transistor having a second width substantially greater than the first width of the first, second, third, and fourth regions of the SCR. Accordingly, Applicant respectfully submits that claim 11 and the claims dependent thereon are patentable over the references.

The other references cited by the Examiner have been reviewed, but are not felt to come within the scope of the claims as amended.

In light of the above, Applicant respectfully requests withdrawal of the Examiner's rejections and allowance of claims 1-2, 4, 6-22 and 24. If the Examiner has any questions or other correspondence regarding this application, Applicant requests that the Examiner contact Applicant's attorney at the below listed telephone number and address.

Respectfully submitted,

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